

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

Delmore will take steps to ensure modern slavery risks are addressed:

- 1. Awareness and Education:** Ensure that business owners, employees, and suppliers are aware of modern slavery issues. Training and education to help identify signs of exploitation and promote vigilance.
- 2. Supply Chain Due Diligence:** Assess our supply chain thoroughly. Understand where our products or services come from and who our suppliers are. The use of tools like supplier questionnaires or audits to evaluate their practices.
- 3. Supplier Engagement:** Engage with suppliers to discuss ethical practices, labour conditions, and compliance. Encourage transparency and open communication.
- 4. Policies and Procedures:** Develop clear policies and procedures that explicitly address modern slavery. These will cover things such as: recruitment, working conditions, and human rights.
- 5. Risk Assessment:** A risk assessment to identify vulnerable areas in your business operations. Prioritize high-risk activities or suppliers for further scrutiny.
- 6. Collaboration:** Collaborate with industry associations, NGOs, and other businesses to share best practices and learn from each other.
- 7. Reporting and Transparency:** To publish a statement on our website about our commitment to combat modern slavery. Transparency builds trust with customers and stakeholders.

Addressing modern slavery is an ongoing process, and Delmore can make a significant impact by taking proactive steps.

DELMORE LTD

MODERN SLAVERY AND HUMAN TRAFFICKING POLICY

1. PURPOSE OF THIS POLICY

1.1 Modern slavery is a criminal offence in Ireland under Irish law under and the UK Modern Slavery Act 2015 (the “Act”). Modern slavery can occur in various forms, including servitude, forced or compulsory labour and human trafficking, all of which have in common the deprivation of a person’s liberty by another in order to exploit them for personal or commercial gain. This document sets out the policy of Delmore (the “Company”) with the aim of the prevention of opportunities for modern slavery to occur within its businesses or supply chain. This policy’s use of the term “modern slavery” has the meaning

A person commits an offence if—

- (a) the person holds another person in slavery or servitude and the circumstances are such that the person knows or ought to know that the other person is held in slavery or servitude, or
- (b) the person requires another person to perform forced or compulsory labour and the circumstances are such that the person knows or ought to know that the other person is being required to perform forced or compulsory labour.

And as in Article 4 of the European Convention of Human Rights:

Slavery is when someone owns you, like a piece of property.

Servitude is similar to slavery - you might provide services to a person for no reward, and be unable to stop due to coercion, but the person does not own you.

Forced or compulsory labour means you are forced to do work that you have not agreed to, under the threat of punishment.

1.2 We have a zero-tolerance approach to modern slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own businesses or those of our suppliers

SOCIAL COMPLIANCE

At Delmore we will ensure conformance to the rules of social accountability, including not only our own policies and practices but also those of our supply and distribution chains. Social Compliance is a continuing process in which we will keep on looking for better ways to protect the health, safety, and fundamental rights of our employees, and to protect and enhance the community and environment in which we all operate.

2. STEPS FOR THE PREVENTION OF MODERN SLAVERY

2.1 We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains. We expect the same high standards from all of our suppliers. We expect our suppliers to hold their own suppliers to the same high standards.

2.2 All team members have an obligation to familiarise themselves with our procedures to help in the identification and prevention of modern slavery and to conduct business in a manner such that the opportunity for and incidence of modern slavery is prevented. Adherence to this policy forms part of all team members’ obligations under their contract of employment.

2.3 Whilst recognising our statutory obligation to set out the steps we have taken to ensure that modern slavery and human trafficking is not taking place in our supply chains, we acknowledge that we do not control the conduct of individuals and organisations in our supply chains. To underpin our compliance with practical steps, we intend to implement the following measure:

1. conduct risk assessments to determine which parts of our business and which of our suppliers are most at risk of modern slavery so that efforts can be focused on those areas;
2. engage with our suppliers both to convey to them our Anti-Slavery Policy and to gain an understanding of the measures taken by them to ensure modern slavery is not occurring in their businesses;
3. Where appropriate, as informed by our risk assessment, seek to introduce supplier pre-screening (for example as part of our tender process) and self-reporting for our suppliers on safeguarding controls;
4. Introduce contractual provisions for our suppliers to confirm their adherence to this policy and accept our right to audit their activities and (where practicable) relationships, both routinely and at times of reasonable suspicion.

3. RESPONSIBILITY FOR THE POLICY

3.1 Ultimate responsibility for the prevention and prevention of modern slavery rests with the director of the Company who has overall responsibility for ensuring this policy and its implementation complies with our legal and ethical obligations

3.2 Managers and supervisors at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery.

4. ACTIONS TO REPORT MODERN SLAVERY OR HUMAN TRAFFICKING

Whistleblowing Procedure – direct access to the Director The Company’s Whistleblowing Procedure is intended to provide guidance on how concerns can be communicated to the Company. Concerns about suspected modern slavery associated with the Company or our suppliers may be reported by employees in this manner. The Whistleblowing Procedure applies to employees and may be found in the Policy. In summary, team member should approach either the Director, or senior leader. The nature of the complaint will determine the Company’s next course of action.

You report in any of the following circumstances:-

1. You suspect a person acting on behalf of Delmore is seeking to exploit another in a way which could amount to modern slavery;
2. You suspect that a person acting on behalf of one of our suppliers is seeking to exploit another in a way which could amount to modern slavery;
3. You have received an approach from a person acting on behalf of Delmore who has invited you to participate in acts which could result in offences under the law being committed;

4. You have information which leads to the rational conclusion that a person acting on behalf of Delmore or our suppliers is preparing to commit, is committing or has committed an act in contravention of Irish law. Reports to the are kept in confidence, subject to the need for Delmore to act responsibly and within the law. The source of reports will be kept confidential, save to the extent that our maintaining that secrecy or the anonymity of the source is not permitted by law, or is not consistent with our maintaining our adequate procedures for the prevention of modern slavery being committed on our behalf or in any element of our supply chain.

The Company encourages members of the public or people not employed by us to write, in confidence, to the Director, Delmore Ltd, 94 Hanmpstead Avenue, Mildenhall, IP28 7AS, to raise any concern, issue or suspicion of modern slavery in any part of our business or related supply chain.

5. SAFEGUARDS

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. The Company will accept and take seriously concerns communicated anonymously. However, retention of anonymity does render investigations and validation more difficult and can make the process less effective. Individuals are therefore encouraged to put their names to allegations. Any claims or allegations made which are found to be malicious or vexatious will result in disciplinary action being taken against the individual.

6. COMMUNITION AND AWARENESS OF THIS POLICY

Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

Date: 10th June 2024

Signed:

Elizabeth Munro
Delmore Ltd
94 Hampstead Avenue
Mildenhall
IP28 7AS